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**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA,
SOUTHERN DIVISION**

9 LISA LIBERI, et al
10 Plaintiffs,
11 vs.
12 ORLY TAITZ, et al,
13 Defendants.
14 CIVIL ACTION NUMBER:
15 8:11-cv-00485-AG (AJW)
16 DECLARATION OF LISA
17 OSTELLA
18 Date of Hearing: June 13, 2011
19 Time of Hearing: 10:00 a.m.
20 Location: Courtroom 10D

Declaration of Lisa Ostella

I, Lisa Ostella am over the age of 18 and am a party to the within action. I have personal knowledge of the facts herein, and if called to do, I could and would competently testify. I am making this Declaration under the penalty of perjury of the Laws of the United States pursuant to 28 U.S.C. §1746.

25 1. As Orly Taitz attempts to reduce the focus of our suit to a school yard
26 argument of 'it's mine', I found the need for this declaration to address to Your
27 Honor the fact that Orly Taitz is submitting to your Court forged documents and
28

1 false statements.

2 2. Orly Taitz, herself, addresses the fact that the domain,
3 defendourfreedoms.net was never used by her; see page 4 paragraph 14, lines 18-
4 20 of Orly Taitz's Declaration. Orly Taitz at page 4, paragraph 16, lines 26-28 of
5 her declaration cites her Exhibit "4". Orly Taitz's exhibit "4" is nothing but her
6 own paper mache exhibit claiming the sidebar elements of my blog stated "DOFF"
7 (Defend Our Freedoms Foundation). My blog located at
8 <http://defendourfreedoms.net> did not have "DOFF" (Defend our Freedoms
9 Foundations) or the statement "...while raising money for DOFF" located any
10 place on my blog site, <http://defendourfreedoms.net>.
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12 3. Drawing your Honor's attention to the sidebar in Orly Taitz's Exhibit
13 "4", it clearly states Defend Our Freedoms **Community Network**.
14

15 4. Taitz's Exhibit "4" is created with scissors and tape and multiple
16 pages of different sidebar elements that appeared over time on the
17 defendourfreedoms domains, including the domain she was using,
18 defendourfreedoms.us. The defendourfreedoms site had many customizable
19 sidebar elements since January 2009.
20

21 5. For a blog, which is a database that runs within a web template, when
22 you use the print function of your browser, it prints the text that runs within the
23 database. The html template is the frame or layout of the blog. The browser stamps
24

1 the header with the Meta Title (the Meta Title declares the title of the html page)
2 and with the page URL (URL stands for *Uniform Resource Locator*, the global
3 address of documents and other resources on the World Wide Web), and date of
4 print. Attached as **EXHIBIT “A”** is a screen shot (picture) of the print-preview of
5 my Happy Mother’s Day post of May 10, 2009. In the top left of **EXHIBIT “A”**
6 you see the Meta title and in the bottom left of **EXHIBIT “A”** you see the URL.
7
8 In the bottom right of **EXHIBIT “A”** you see the date and on the top right of
9 **EXHIBIT “A”** you see the page numbers. The screen shot (picture) attached as
10 **EXHIBIT “A”** was taken using Internet Explorer web browser. The order of the
11 Meta title; URL; page numbers and date can vary depending on what Internet
12 browser you are using. Regardless of the browser being used, the Meta title, URL,
13 date and page numbers always appear on the print copy.

17
18 6. What Taitz has done with her Exhibit “4” is pasted a press release
19 received from a campaign email and pasted it onto a browser print screen that she
20 printed out from defendourfreedoms.net. Attached as **EXHIBIT “B”** is a copy of
21 the actual email sent out on May 10, 2009. On the Press release, **EXHIBIT “B”**
22 under the Obama Crimes logo, you will see
23 <http://defendourfreedoms.createSend3.com/t/r/l/tdirg/pdtiylid/y>, the same URL
24 appearing on Orly Taitz’s Exhibit “4”. This was not the URL appearing on this
25 post located on my blog, see **EXHIBIT “A”**.
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1 7. CreateSend3 is the domain for my account with Campaign Monitor.
2 Campaign Monitor is my mass mailing account I use for clients' press releases.
3
4 The email attached as **EXHIBIT “B”** is a press release that was sent out in mass
5 mail on behalf of Mr. Berg, as well as posted on my blog. This press release
6 posted on my blog May 10, 2009, I manually formatted. This May 10, 2009 post is
7 still available on my blog at [http://defendourfreedoms.net/2009/05/10/happy-](http://defendourfreedoms.net/2009/05/10/happy-mothers-day-.aspx)
8 [mothers-day-.aspx](http://philbergvsobama.com). The domain link appearing under the logo on my blog site has
9 always been <http://philbergvsobama.com>, see **EXHIBIT “A”**. That was a domain
10 Philip J. Berg owned at that time and it was pointing to his website.
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13 8. As I stated in paragraph 5 above, a browser print shows the Meta title
14 and page URL. The date stamp in the footer of Taitz's Exhibit 4 says 5/11/2009.
15 There were two posts made on 5/11/2009, after my Happy Mother's Day post,
16 which would have changed the position of the press release on my blog. In order
17 for that post to be display in the fashion Taitz is presenting with her Exhibit “4”,
18 the URL of the post would have [http://defendourfreedoms.net/2009/05/10/happy-](http://defendourfreedoms.net/2009/05/10/happy-mothers-day-.aspx)
19 [mothers-day-.aspx](http://defendourfreedoms.net/2009/05/10/happy-mothers-day-.aspx) and not just <http://defendourfreedoms.net/>. The Meta title
20 appearing on Orly Taitz's Exhibit “4” is not consistent with the printing of this
21 blog page as demonstrated by my **EXHIBIT “A”**.
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24 9. Orly Taitz in her declaration has now created and presented a brand-
25 new story regarding the lawsuit against her. On page 3, paragraph 9, lines 15-24,
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27

1 Orly Taitz falsely states there was unauthorized commercial activity relating to T-
2 shirt sales on her site. Orly Taitz also falsely states she confronted me and
3 demanded a copy of the contract and an accounting of all funds received as a result
4 of the T-shirt sales. Contrary to Orly Taitz's statements, I had nothing to do with
5 the T-shirt creation and/or sales, see attached hereto as **EXHIBIT "C"** the email
6 exchanges between Orly Taitz, Neil Sankey, me and another individual that shows
7 Orly Taitz involvement with the T-shirts and Orly Taitz's pricing of these T-shirts.
8 The link to the sales of these T-shirts was never on any of the defendantfreedoms
9 sites. I have no knowledge of who handled the T-Shirts on behalf of Orly Taitz.

10 10. I purchased the defendantfreedoms domain names in December 2008,
11 before Orly Taitz registered the company name of "Defend our Freedoms
12 Foundations, Inc." and before this company name was incorporated, as admitted in
13 Orly Taitz's Declaration. My domain names have always been on my servers and
14 in my control. I allowed Orly Taitz to use my domain defendantfreedoms.us. Orly
15 Taitz never paid me for my domain name(s) nor has she ever attempted to purchase
16 my domain names from me.

17 11. Once Orly Taitz began falsely claiming her website and PayPal
18 accounts had been "hacked", at this point, Orly Taitz wanted me to lie to law
19 enforcement and substantiate her story, which I refused to do.

20 12. I told Orly Taitz she must withdraw her false claims of "hacking",
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22

1 which she refused to do. At this point, I told her she had to find a new webmaster.
2 Instead of complying, Orly Taitz changed her story that I had “hacked” her site and
3 PayPal. In fact, Orly Taitz did articles with World Net Daily (WND) and went on
4 radio shows falsely accusing me of these crimes.

6 13. At that point, I locked the domains to maintain the site intact and I put
7 up a post 'Understanding the Internet 101', to protect myself from Orly Taitz's false
8 allegations. This post is still available online at
9 <http://defendourfreedoms.net/2009/04/12/understanding-the-internet-102.aspx>. In
10 this post, I explain that Orly Taitz's site and PayPal were never “hacked”. I
11 included email exchanges and screen shots (pictures) to support my statements and
12 to protect myself. This is also explained in our Complaint and in other affidavits
13 on file in this case.

14 14. This is not the first time Orly Taitz has altered/forged pages from my
15 blog site. In the case of *Rivernider, et al v. U.S. Bank National Association*, filed
16 in the U.S. District Court, Southern District of Florida, Case No. 9:09-cv-81255-
17 WPD, I was a witness on behalf of Charles Edward Lincoln, III. Orly Taitz filed a
18 letter with the Florida Court with another altered version of my blog site attached
19 as her Exhibit “D”, see the letter of Orly Taitz attached as **EXHIBIT “D”**, pages
20 67-69. I immediately responded to Orly Taitz's false allegations and
21 forged/alterred documents by way of another Affidavit see **EXHIBIT “E”** and
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1 explained the alterations (forgery). I also included a screen shot (picture) of my
2 blog site page, which Orly Taitz had altered, showing the alterations made by Orly
3 Taitz in her attempt to mislead and defraud the Florida Court.
4

5 15. Orly Taitz as an attorney and an officer of the Court filed false reports
6 against me claiming I had a criminal record; that Lisa Liberi and I were the same
7 person; that I stole funds from her; that I had an extensive criminal record for
8 forgery, theft and fraud; and gave a different account of the events than she is now
9 providing to this Court. Orly Taitz filed this false report with the Orange County
10 Sheriff's Department, Report No. 09-068339, see **EXHIBIT "F"**. Orly Taitz
11 repeated her false allegations to the Orange County FBI, Supervisor Michael Haas;
12 the Los Angeles FBI, Agent Nathan Lee; the California Attorney General; the
13 Senate Judiciary Committee; the United States Department of Justice; the North
14 Brunswick Police Department; and various other agencies.
15

16 16. The reason I sued Orly Taitz is due to the facts she ran illegal
17 background checks on me, as admitted in the Orange County Sheriff's Department
18 Report attached as **EXHIBIT "F"**; she ran illegal credit checks; she filed false
19 law enforcement reports against me; she put "call outs" for retaliation on me and
20 my family; she falsely accused me and my husband of theft; she threatened to have
21 my children professionally kidnapped; she physically came to New Jersey driving
22 around my home and my children's schools stalking me and my family; she
23

1 published my personal identifying information; she contacted friends, business
2 associates and family members of mine accusing me of theft and other false
3 allegations; and many other acts which have completely destroyed my reputation
4 and my business, not to mention endangering my family.

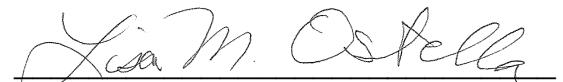
5 17. Also, Orly Taitz in her declaration on pages 3 and 4 in paragraph 10,
6 Orly Taitz again raises donations she claims she didn't receive. These are the same
7 donations; Orly Taitz has claimed on numerous occasions that I stole. Orly Taitz
8 posted two PayPal receipts of donations she claims she did not receive, see
9 **EXHIBIT "G"**. According to Orly Taitz's PayPal records subpoenaed on May 4,
10 2010, Orly Taitz received these donations; see **EXHIBIT "H"**, page 155.
11

12 18. My bank statements and PayPal records show that I never took in any
13 monies as claimed by Orly Taitz. My bank and PayPal records were reviewed by
14 the Denville Police Department. My bank and PayPal records were submitted to
15 Judge Robreno's Court at our December 20, 2010 TRO hearing. A copy of my
16 bank statements and PayPal records were given to Orly Taitz at this hearing. I
17 have no idea why all of our paperwork from the December 2010 hearing that were
18 submitted to the Court did not go up on the Court Docket; but I will resubmit this
19 data if or when it is needed.
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1 I declare under the penalty of perjury of the Laws of the United States and
2 California that the foregoing is true and correct.
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4 Executed this 28th day of May, 2011 in the State of New Jersey.
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6 
7 LISA OSTELLA, Plaintiff
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